

REMARKS

This is in response to a non-final Office Action mailed February 11, 2004. Applicant respectfully traverses and requests reconsideration.

Rejection of Claims under 35 U.S.C. § 112

Claims 2, 5-11, 13, 17-18 and 21-22 currently stand rejected under 35 U.S.C. § 112, Paragraph 2. Applicant submits that in view of the above-proposed amendments to claims 21 and 22, the rejection is improper.

Regarding claim 21, Applicant respectfully submits the present amendment directed to “storing at least the second portion of the active decoded video in the video memory associated with a first VGA.” It is submitted that claim 21 as amended provides proper antecedent basis for the limitation of the video memory as the video memory is claimed as the video memory associated with the first VGA. Furthermore, claims 2, 6-11 and 13 depend thereon from claim 21. As such, it is submitted the present rejection regarding claims 2, 6-11, 13 and 21 is improper in view of the present amendment to claim 21. Reconsideration and withdrawal is respectfully requested.

Regarding claim 22, Applicant respectfully submits the above-noted amendment of “displaying at least a first frame of video using a second VGA in response to a second control signal.” On page 3 of the present Office Action, the Examiner indicated that claim 22 as previously noted claimed displaying a portion of a frame of video at a video graphics adapter, which is improper. Furthermore, claims 17 and 18 depend from claim 22. In view of the amendment of claim 22, it is submitted the present rejection is no longer proper with regard to claims 17-18 and 22. Reconsideration and withdrawal is respectfully requested.

Rejection of Claims Under 35 U.S.C. § 102(b)

Claims 2, 6-11 and 21 currently stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,657,046. Applicant respectfully submits the present rejection is improper as Noble fails to disclose each and every single claimed limitation of claims 21, 2 and 5-11.

As understood, Noble discloses a video message display system allowing for the transition of an image to be displayed over a plurality of display monitors. In one embodiment,

preprogrammed graphics may be sequenced and controlled by a master computer to allow for the generation of multiple concurrent images on multiple screens to produce the visual effect of the image being scrolled across multiple screens. Furthermore, Noble discloses independent and separate video modules 10 associated with corresponding separate and individual display monitors 1, such as illustrated in FIG. 11. Within each video module 10, processing elements, such as illustrated in FIG. 12, provide for the generation of a single output display, shown in FIG. 12 as an analog RGB and a composite sync signal. Also, Noble teaches a flow-through system with data transitioning across the modules 10 into the display monitors 1 such that each module 10 generates a stand alone image which is generated to the display 1, such that the overall effect is a single monitor image disposed across multiple monitors. In essence, Noble teaches, *inter alia*, that a plurality of self-contained image display modules provide for the variant display of one general image across multiple screens.

Claim 21 recites limitations to a method of displaying active video on a computer screen including rendering at least a first portion of the first frame of video at the first VGA in response to a first control signal, "wherein the first control signal is a signal specifying a window location for displaying the active video." As further discussed beginning with the second full paragraph on page 5 through the first full paragraph on page 6 of the present application, the present invention allows for an application window to be moved to a different monitor. More specifically, claim 21 claims the first control signal as a signal specifying a window location for displaying the active video. Moreover, claim 21 further recites, *inter alia*, "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal and storing at least a second portion of the active video in the video memory associated with the first VGA."

Applicant initially submits that Noble fails to disclose all of the claimed limitations because Noble does not disclose, *inter alia*, the claimed first control signal. On pages 3-4 of the present Office Action, the Examiner indicates that the limitation of the first control signal as a signal specifying a window location for displaying the active video is disclosed by Noble based on the display control to the display memory section 71 in FIG. 12. An exhaustive review of Noble, including an online search of the text of the Noble patent on the USPTO website, concludes that Noble does not disclose the display control signal between the programmable gate array 50 in the display memory section 71. At best, beginning on col. 6, line 60 through col. 10,

line 9, Noble provides a general discussion of the operations of the preferred video module 10 internal layout. This broad discussion does not provide any indication as to the disclosure of the illustrated display control signal in FIG. 12 and does not provide further discussion of it within the body of the specification.

In FIG. 13, Noble illustrates the display control as an output from a RAM select decoder 60 which is described in the specification as selecting one of four RAM banks and selects one of three colors. As can best be understood based on the teachings of Noble, a particular RAM bank is selected in addition to a RAM color selected decoder. Thereupon, this determines which portion of an overall image is to be provided for display on a particular output device, which is wholly inconsistent with the claimed limitation of specifying a window location for displaying the active video. In other words, Noble indicates which portion of a preset image is to be provided for display, whereas the claimed present invention claims a signal indicating a window location.

Noble operates in a completely different manner, which is selecting a portion of an output to be visible on an overall display. Noble also produces a completely different result, which is a visible portion of a full image, rather than the claimed present invention which includes a signal that specifies a window location for displaying the active video.

Applicant further submits that Noble fails to disclose the claimed limitation of "rendering at least a second portion of the first frame of video at a second VGA in response to a second control signal and **storing at least second portion of the active decoded video in the video memory associated with the first VGA.**" (emphasis added). On page 4 of the present Office Action, the Examiner indicates this limitation as being disclosed in view of the Display Memory Section 71. Applicant submits this is improper because Noble discloses the display memory section 71 being with the video module 10. As noted in FIG. 11, Noble consists of multiple video modules 10, wherein each module includes the elements of FIG. 12. Therefore, each different module 10 includes a separate display memory section 71. Based on the presence of numerous display memory sections 71, each memory sections 71 being embedded within corresponding modules 10, Noble would not disclose storing output data for a display monitor (e.g. Display Monitor 2) generated by Video Module 2 in the display memory section 71 of Video Module 1 associated with Display Monitor 1. Therefore, Noble discloses, at best, storing

Video Module 1 data in a first display memory section 71 associated with the first video module and storing Video Module 2 data in a second display memory section 71 associated with a second video module. Whereas, claim 21 recites limitations to storing second VGA data in the first video memory associated with the first VGA.

Therefore, it is submitted that once again Noble operates in a completely different manner by having a single memory 71 per module and produces a completely different result which is only reading and writing data to and from the single corresponding memory 71 per module. As such, reconsideration and withdrawal is respectfully requested.

Should the Examiner maintain the present rejection, Applicant respectfully requests a showing, including specific column and line numbers, of where Noble explicitly teaches the claimed limitations of the present invention, include, *inter alia*, (1) the first control signal being a signal specifying a window location for display active video and (2) storing at least second portion of the active decoded video in the video memory associated with the first VGA

Regarding claim 5, it is submitted that the present rejection is improper in view of the cancellation of claim 5, without prejudice.

Regarding claims 2 and 6-11, it is submitted these claims contain further patentable subject matter and are allowable not merely as being dependent upon an allowable base claim. For example, Noble fails to disclose the usage of a direct memory access controller, as recited in claims 6 and 7. The Examiner notes in the present Office Action that Noble discloses the graphics computer as the function of memory access controller, but it is submitted that this does not disclose the claimed direct memory access as succinctly and specifically recited in claims 6 and 7. It is noted that a memory access controller does not specifically disclose a DMA controller.

Furthermore, claims 8 and 9 recite limitations to the first and second VGA as being primary and secondary VGAs. Applicant submits that Noble does not disclose any ordering or structuring other than a common numbering nomenclature. As noted, FIG. 11 of Noble, video module 1, module 2 and the video module N is merely a numbering order and does not provide for the claimed limitation of primary and secondary VGA. It is recognized by one having ordinary skill in the art that the terms primary and secondary are applicable to video graphics

adapters have well known meanings within the art and do not merely imply a numbering, but rather indicate a known and instructed process ordering technique.

Furthermore, claim 11 recites receiving at the second VGA, second frame of active video from a second video source and rendering at least a portion of the second frame of video at the first VGA. As discussed above, Noble is a one way system providing a data flow through and does not disclose a system having multiple sources for rendering different portions of a single source across multiple modules. On page 6 of the present Office Action, the Examiner indicates that channel A and channel B depict two different sources, regardless thereof it is submitted that Channel A and Channel B does not provide any distinctive disclosure of the claimed limitation of receiving a second frame at the second VGA from a second source and rendering at least a portion of the second frame at the first VGA. Rather, the Examiner provides support based on the generalized discussion regarding FIG. 12.

Therefore, Applicant submits that claims 2 and 6-11 are further patentable in view of Noble as Noble fails to disclose all of the claimed limitations. Should the Examiner maintain the present rejection, Applicant requests a showing, including column and line numbers, where each of the specific limitations of claims 6-11 and claim 2 are disclosed including, but not limited to, the rendering a portion of a second frame of video at a first VGA, secondary and primary VGA designations and direct memory access controller. In the alternative, Applicant requests reconsideration and withdrawal and the passage of these claims to issuance.

Rejection of Claims Under 35 U.S.C. § 103(a)

Claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Noble in view of U.S. Patent No. 4,949,169 ("Lumelsky"). Applicant respectfully resubmits the above offered position regarding claim 21 and submits that claim 13 contain further patentable subject matter in view thereof. As discussed above, Noble fails to disclose, and thereby fails to teach or suggest all of the claimed limitations of independent claim 21. Therefore, adding further limitations with regard to storing the window location in a preference file would not be disclosed by a combination of Noble with Lumelsky. Therefore, the combination of Noble and Lemulsky fails to teach or suggest all of the claimed limitations and one of ordinary skill in the art would not be so inclined or motivated to combine these references because the combination thereof fails

to produce the claimed present invention. Applicant requests reconsideration and withdrawal of the present rejection.

Claims 22 and 17-18 currently stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Noble in view of U.S. Patent No. 5,523,769 ("Lauer"). Applicant respectfully submits that based on the above amendments to claim 22, the rejection is improper. As discussed above with regard to claim 21, Noble fails to teach or suggest all of the claimed limitations including, *inter alia*, the second control signal is a signal specifying a window location for displaying the active video. As discussed above, Noble fails to teach or suggest the claimed second control signal as Noble does not specify window locations, but rather determines specific row and columns for the beginning of data alignment for eventual display on a single corresponding display. Therefore, for at least the reasons stated above, it is submitted that claim 22 contains patentable subject matter in view of the combination of Noble and Lauer.

Regarding claims 17 and 18, it is submitted that these claims contain further patentable subject matter and are allowable not merely as being dependent upon an allowable base claim. Therefore, reconsideration and withdrawal is respectfully requested. Should the Examiner maintain the present rejection, Applicants request a showing, including column and line numbers of where Noble discloses the claimed control signal. In the alternative, Applicants request passage of claims 22 and 17-18 to issuance.

Applicant respectfully submits that the claims are in condition for allowance and that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

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Respectfully submitted,

By: 

Timothy J. Bechen

Registration No. 48,126

VEDDER, PRICE, KAUFMAN &
KAMMHOLZ, P.C.
222 N. LaSalle Street
Chicago, IL 60601
(312) 609-7870
FAX: (312) 609-5005